

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in compliance with D.N.J. LBR 9004-2(c)

**CULLEN AND DYKMAN LLP**

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Counsel for The Ad Hoc Committee of Employment  
Discrimination Claimants

In Re:

Pilgrim Medical Center, Inc.  
And Nicholas V. Campanella,

Debtors.

Chapter 11

Case No.: 16-15414(VFP)  
Procedurally Consolidated

Judge: Vincent F. Papalia

Hearing Date: August 24, 2017  
At 11:00 a.m.

**THE PLAINTIFFS' LIMITED OBJECTION TO CONFIRMATION OF THE DEBTORS'  
AMENDED SMALL BUSINESS DEBTOR'S AND INDIVIDUAL DEBTOR'S CHAPTER  
11 COMBINED PLAN OF REORGANIZATION AND DISCLOSURE STATEMENT**

TO: THE HONORABLE VINCENT F. PAPALIA, U.S.B.J.:

Jacqueline Jalil, Luisa Rojas and Tiana Mena (collectively, the "Plaintiffs") through their attorneys, Cullen and Dykman LLP, respectfully submit a limited objection to approval of the Amended Small Business Debtor's and Individual Debtor's Chapter 11 Combined Plan of Reorganization and Disclosure Statement (the "Plan").

1. Currently the Debtors have insufficient funds to confirm the Plan.
2. Annexed hereto as Exhibit A is an estimated calculation of the balance due upon the Judgment, accrued interest through August 17, 2017, and estimated counsel fees reflecting a balance due of \$1.5 million.

3. The Debtor's current funding consists of: (i) approximately \$1.1 million available from the sale of the Sea Girt property, and (ii) approximately \$350,000 to \$400,000.00 to be generated by the sale of the Haskell property within the next few days.

4. The foregoing funds total approximately \$1.4 million and are insufficient to cover the existing claims. In addition, pursuant to the Stipulation of Settlement entered into between the Debtors and the Plaintiffs (the "Stipulation"), the Debtors are liable for satisfying the Plaintiffs' counsel fees incurred implementing and enforcing the terms of the Stipulation. Consequently, an appropriate cushion of \$200,000.00 above the current calculation of \$1.5 million is warranted.

5. The Plaintiffs understand that the Debtor is seeking financing in an effort to cover this shortfall. Thus, the status and amount of such financing will be critical to confirmation.

6. The Plaintiffs have not had an opportunity to review a proposed form of Confirmation Order, and respectfully submit the following comments with respect thereto:

- a) The Order should provide for the prompt turnover of the sale proceeds arising from the sale of the Sea Girt property and the Haskell property to John Murano, Esq., the administrator of the Stipulation.
- b) The Order should clearly incorporate the terms of the Stipulation and annex a copy of the Stipulation thereto.
- c) The Order should provide that in the event of a contradiction between the terms of the Plan and the Stipulation, the Stipulation will govern.
- d) The Order should provide that approval of the Plan constitutes approval of the Stipulation.

e) A procedure for monthly submission of the Plaintiffs' counsel fees, combined with a ten (10) day period to review and object thereto, followed by payment from the administrator's funds, should be set forth in the Order.

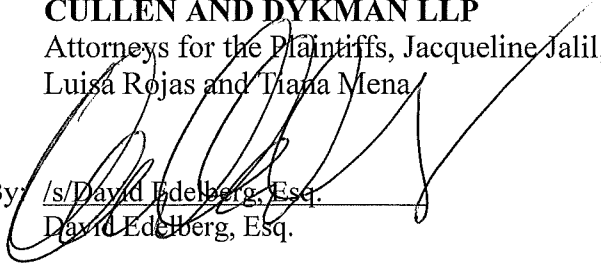
7. Subject to reviewing the proposed Confirmation Order addressing the foregoing comments, and adequate funding, the Plaintiffs support approval of the Plan.

Respectfully submitted,

**CULLEN AND DYKMAN LLP**

Attorneys for the Plaintiffs, Jacqueline Jalil,  
Luisa Rojas and Tiana Mena

Dated: August 17, 2017

By:  /s/ David Edelberg, Esq.  
David Edelberg, Esq.

## **EXHIBIT A**

The following is a calculation of the Judgment, accrued interest and counsel fees to the extent known (August 17, 2017):

Judgment dated December 4, 2015	\$1,107,346.83
Judgment Interest December 4, 2015 through December 31, 2016	\$ 26,963.14
Subtotal	\$1,134,309.97
Interest at 5% through August 17, 2017 (per diem 155.384927)	\$ 35,427.76
Subtotal	\$1,169,737.73
Cullen and Dykman, LLP Fees Allowed September 28, 2016 to November 16, 2016	\$ 50,504.00
Cullen and Dykman, LLP Expenses Allowed September 28, 2016 to November 16, 2016	\$ 253.33
Cullen and Dykman, LLP Fees Applied For November 17, 2016 to April 21, 2017	\$ 67,850.00
Cullen and Dykman, LLP Expenses Applied For November 17, 2016 to April 21, 2017	\$ 530.79
Murano & Roth Legal Fees	\$ 29,750.00
Murano & Roth Costs	\$ 1,448.83
Murano & Roth Enhancement (40%)	\$ 11,900.00
Deutsch Atkins legal fees December 11, 2015 to April 13, 2017	\$ 108,877.00
Deutsch Atkins costs	\$ 5,714.96
Deutsch Atkins Enhancement (40%)	\$ 43,550.80
TOTAL	\$1,490,117.44